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May 13, 2016

VIA FIRST CLASS AND ELECTRONIC MAIL

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Re: Adv. Pro. No. 10-05048 (SMB); *Picard v. Estate of Armand L. Greenhall, et al.*; In the
United States Bankruptcy Court for the Southern District of New York.

Dear Counsel:

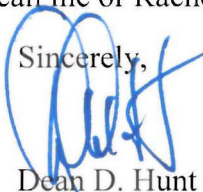
This letter is an attempt to confer with you regarding discovery deficiencies, pursuant to Judge Bernstein's Chambers Rules and Rule 7007-1 of the Local Rules of the United States Bankruptcy Court of the Southern District of New York

Defendants' responses to the Trustee's First Sets of Requests for Admission, Interrogatories and Requests for Production of Documents were due on May 9, 2016. None of the responses have been received. As a result, the Trustee's Requests for Admission are deemed admitted under Federal Rule of Civil Procedure 36(a)(3), and any objections to the Trustee's Interrogatories and Requests for Production are waived under Federal Rules of Civil Procedure 33(b)(4) and 34.

Before taking further action as provided for by Judge Bernstein's Chambers' Rules and by the Local Rules of the Bankruptcy Court, we are attempting to resolve these discovery issues. Please provide responses to the Trustee's Interrogatories and Requests for Production, and produce documents by May 27, 2016.

If you would like to discuss, please call me or Rachel Smith at 713-646-1386.

Sincerely,



Dean D. Hunt